

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

BRIDGET PARKER,
Plaintiff

V.

JOSH DALL-LEIGHTON,
SCOTT LANDRY,
RANDALL LIBERTY,
RENEE SHANKS,
DR. JOSEPH FITZPATRICK, and
STATE OF MAINE,
Defendants

Docket No. 2:17-CV-00216-GZS

DEFENDANT RENEE SHANKS'S MOTION TO DISMISS THE PLAINTIFF'S
COMPLAINT IN ACCORDANCE WITH F.R.CIV.P. 12(b)(6) FOR FAILURE TO STATE A
CLAIM UPON WHICH RELIEF CAN BE GRANTED

NOW COMES the Defendant, Renee Shanks, by and through her attorney, Patrick S. Bedard, and moves that this Honorable Court dismiss the Plaintiff's Complaint against Renee Shanks for Failure to State a Claim Upon Which Relief Can Be Granted. F.R.Civ.P. 12(b)(6). The Defendant Renee Shanks submits a Memorandum of Law in Support of her Motion to Dismiss.

WHEREFORE the Defendant Renee Shanks moves that this Honorable Court dismiss the Plaintiff's Complaint against her for failure to state a claim upon which relief can be granted.

RESPECTFULLY SUBMITTED:

RENEE SHANKS

By Her Attorneys

DAVID J. BOBROW, ME Bar No. 9164

PATRICK S. BEDARD, ME Bar No. 3813

BEDARD & BOBROW, PC.

P.O. Box 366

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Eliot, ME 03903

207-439-4502

Date: September 14, 2017

/s / David J. Bobrow

David J. Bobrow, Esq.

Date: September 14, 2017

/s / Patrick S. Bedard

Patrick S. Bedard, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on this date I served a copy of the Defendant Renee Shanks's Motion To Dismiss The Plaintiff's Complaint In Accordance With F.R.CIV.P. 12((b)(6) For Failure To State A Claim Upon Which Relief Can Be Granted on all counsel on record via the ECF system.

Date: September 14, 2017

/s / Patrick S. Bedard

Patrick S. Bedard, Esq.